



March 3, 2016

We wish to comment on Raised Bill 231, AN ACT CONCERNING POLLINATOR HEALTH

We wish to congratulate the sponsors of this bill as being the first bill in Connecticut to specifically address this very important subject. Most pollinator populations in our state are in decline and have been for decades. The services that these pollinators perform are important not only to food production but also to the entire ecosystem.

We are glad to see that this bill addresses one of the major factors in pollinator decline, the widespread use of neonicotinoids which are toxic to bees. Of concern also is that these insecticides are systemic, non-selective, water soluble, pervasive and persistent in soils, making them a threat to other insects, birds, macroinvertebrates, and water resources.

Section 1. Developing “best practices for the minimization or complete elimination of the airborne liberation of neonicotinoid insecticide dust and residue” from treated seeds is a step in the right direction. It is known that the dust from such applications is a major source of contamination to the air and adjacent waterways. It is our hope that any developed best practices will be effective and enforceable.

Section 2. We support the ban of neonicotinoids on linden and basswood trees to prevent mass bee die-offs as has happened in other states.

Section 4(b) states “During the blooming season, no person shall use neonicotinoids except for agricultural and horticultural uses.” **We oppose this section.** Why would one make exceptions for agricultural and horticultural uses when these are the major if not exclusive uses of the application of neonicotinoids? We suggest the following wording: “No persons shall spray a plant species with neonicotinoids during the blooming season for that particular plant species.” If we need to make exceptions for instances when a certain species is in danger of extinction or serious threat in a particular locale, then emergency provisions could be written into the bill. Any exceptions however should require review by an appropriately informed body.

Section 5. Establishing a task force is an important step in revealing the extent to which neonicotinoids are harming our pollinators and threatening our environment and developing strategies to minimize these risks.

Section 6. “No person shall label or advertise any plant that was treated with a neonicotinoid as being beneficial to honey bees or any other pollinators.” This is good as far as it goes. However, big box stores and nurseries could still sell plants that have been treated with neonicotinoids

without labeling them as posing a risk. Therefore, **we ask that this section be amended** as follows: “Any nursery plant, seed or seedling that has been treated with neonicotinoids must be labeled as harmful to pollinators.” Also garden products that contain neonicotinoids for sale to homeowners and landscapers must have prominent labeling to indicate that such products are harmful to pollinators. (There is an EPA labeling requirement already in place (2013) which is not being adhered to in Connecticut).

Section 9, 10 and 11. Giving priority to lands which contain model pollinator habitat is a very good way to focus on the issue of lost habitat and to save some of those existing habitats.

Section 12. Developing a citizen’s guide to model pollinator habitat is a good idea which again brings attention to the plight of pollinators as well as providing some guidance for citizen action.

Some other thoughts: 1) Another section might reference taking advantage of any federal grants or monies made available for pollinator projects, such as linear pollinator habitats along state highways. 2) We would like the Governor to recognize Pollinator Week, June 20-26 this year, with an official proclamation in support of pollinators.

We thank you for your attention to our comments, and also for bringing forward this important topic.

#### Protect Our Pollinators

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